

CASE NUMBER: 1:21-cv-506

- 3) In the Plaintiff's Motion to Continue the trial, she also seeks to send a supplemental notice to any new class members from November 2023 to present, and seeks to have the Defendants produce an updated class list and updated payroll/timekeeping information for the final class members in order to prepare a damages summary to aid the jury at trial.
- 4) To the extent the Plaintiff's Motion to Continue is based upon discovery related grounds, the Defendants object to such requests for the following reasons;
- a. To the extent the Plaintiff believes she is entitled, the Plaintiff has not filed a proper motion citing any facts, law or authority for the issuance of a supplemental notice; and,
 - b. To the extent the Plaintiff believes she is entitled, the Plaintiff has not filed a proper motion citing any facts, law or authority requiring the Defendants to produce an updated class list and updated payroll/timekeeping information for the final class members in order for the Plaintiff to prepare a damages summary to aid the jury at trial.
- 5) Without properly moving the Court, the Defendants are unable to adequately respond to Plaintiff's aforementioned requests.

WHEREFORE, the Plaintiff's Motion to Continue the Trial of this matter should be GRANTED based upon the Court's February 28, 2024 Order, and DENIED to the extent that it seeks such a continuance based upon the discovery related reasons.

This the 2nd day of April, 2025.

ANGELA GRAY LAW, P.A.

BY: /s/ Angela Gray
Angela Newell Gray
7 Corporate Center Court, Suite B
Greensboro, NC 27408
Telephone: (336) 285-8151
Facsimile: (336) 458-9359
Email: angela@angelagraylaw.com

Attorney for Defendants/Counterclaim Plaintiff
NC Bar # 21006

Case 1:21-cv-00506-LCB-JLW Document 118 Filed 04/02/25 Page 4 of 4